

JAFFE EXHIBIT 90

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO
TRUCKING LLC,

Defendants.

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) Case No.
) 3:17-cv-00939-WHA
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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
VIDEOTAPED DEPOSITION OF PIERRE-YVES DROZ
San Francisco, California
Friday, April 31, 2017
Volume I

Reported by: SUZANNE F. GUDELJ
CSR No. 5111
Job No. 2581643
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Videotaped deposition of PIERRE-YVES DROZ,
Volume I, taken on behalf of Defendants Uber
Technologies, Inc., Ottomotto LLC; Otto
Trucking LLC at the Law Offices of Morrison &
Foerster LLP, 425 Market Street, 33rd Floor,
San Francisco, California, beginning at 9:39
a.m. and ending at 2:52 p.m., on Friday,
March 31, 2017, before SUZANNE F. GUDELJ,
Certified Shorthand Reporter No. 5111.

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HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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[REDACTED]

2

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[REDACTED]

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[REDACTED]

19

(Reporter clarification.)

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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01:19:47

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MR. JAFFE: Objection. Form.

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THE WITNESS: █

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BY MR. JACOBS:

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MR. JAFFE: Just slow down.

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THE WITNESS: █ █

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01:20:52

Page 130

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BY MR. JACOBS:

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01:21:34

16

A Yes.

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Q Let me ask you a couple of questions about

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510 Systems.

19

What is your understanding of the

20

following: 510 Systems gets acquired by Google and 01:21:58

21

one or more people at 510 Systems retain some rights

22

with respect to previously developed technology.

23

Do you have an understanding of that topic?

24

MR. JAFFE: I'm not sure if that's a

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question, but I'm going to object as to form. 01:22:18

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I, PIERRE-YVES DROZ, do hereby declare
under penalty of perjury that I have read the
foregoing transcript of my deposition; that I have
made such corrections as noted herein, in ink,
initialed by me, or attached hereto; that my
testimony as contained herein, as corrected, is true
and correct.

EXECUTED this _____ day of _____,
2017, at _____, _____.
(City) (State)

PIERRE-YVES DROZ

Volume I